ASH GROVE CEMENT COMPANY

"WESTERN REGION"

May 18, 1994

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98119-3958

Re: Notice of Violation #31785

Dear Mr. Austin,

The fugitive emission from the feed and discharge ends of the kiln which occurred on May 6, 1994 was due to process start up and could not be avoided. The start up was consistent with the approved O & M plan. The kiln shut down was a result of losing the main baghouse fan for high vibrations. The fan was quickly restarted without problem but a malfunction in the main burner igniter prevented an immediate kiln restart. While the igniter was being repaired, the kiln cooled sufficiently to require an approximate two hour preheat to replace the lost heat. The emission occurred during this preheat phase and as witnessed by Mr. Larry Vaughn of PSAPCA, completely disappeared when normal operations resumed.

Addressed in my May 9, 1994 letter to PSAPCA, fugitive visible emissions are present during the preheat phase of start up and are directly related to the limited ventilation in the kiln. As you are aware, preheat requires minimal induced draft due to the risk of overheating the empty vessels in the preheating tower. The reduced draft results in a leakage from the feed and discharge ends of the kiln since these locations cannot be completely sealed. This emission disappears once ventilation is introduced to maintain temperature within the preheater after the feed is started. Further, Ash Grove has requested that Order of Approval No. 3382 be amended to excuse from penalty these and similar excess emissions during start up, shutdown and maintenance procedures that cannot be prevented through a better O & M plan, etc. PSD order #90-03 provides for such exemption.

626649

3801 EAST MARGINAL WAY, SOUTH • SEATTLE, WA 98134 • PLANT OFFICE: (206) 623-5596 • FAX: (206) 623-5555

On June 1, 1992, NOV #28577 was issued for an identical event. This resulted in the attached letter proposing operational and equipment venting corrective action (29 June 1992 from Girish Sud, Senior Project Manager, Fuller Company). In addition to corrective actions which are currently utilized, the letter provides information on system design during normal and upset operating conditions.

We look forward to the opportunity to further discuss this condition at our June 9 meeting.

Sincerely,

Gerald J. Brown
Manager, Safety and Environment

Copy: KJR
ESP
HES
JTH

PUGET SOUND AIR POLLUTION CONTROL AGENCY
110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. _____

No. 31785

NOTICE OF VIOLATION

Date of Violation: May 6, 1994 at 4:00 p.m.

Name	Responsible Person, Title		
Ash Grove Cement Company	Gerald Brown - Plant Safety Engr.		
Location of Violation (Address)	**City**	**Zip**	**County**
3801 E. Marginal Wy. So	Seattle	98134	King
Mailing Address	**City, State**	**Zip**	**Phone**
Same			

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

☐	Section 5.05(e)	Failure to develop and implement an operation and maintenance plan.
☐	Section 6.03(a)	Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
☐	Section 6.09(b)	Failure to meet conditions of an Order of Approval.
☐	Section 9.03(a)	Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
☐	Section 9.04	Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
☐	Section 9.11(a)	Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
☐	Section 9.12(b)	Emission of odor-bearing air contaminants without use of best available control technology.
☐	Section 9.15(a)	Emission of fugitive dust without use of best available control technology.
☐	Section 9.15(b)	Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
☒	Section 9.15(c)	Emission of fugitive dust from manufacturing process equipment or control apparatus.
☐	Section 9.16	Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
☐	Section 9.20	Failure to operate and maintain equipment in good working order.
☐	Section _____	
☐	Section _____	

FACTS ALLEGED TO CONSTITUTE A VIOLATION: fugitive emissions from cement kiln front and rear seals

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action: _____

Issued By: D. Vaughn — 5/6/94 Date/Time — Received By: _____

Signing this Notice is not an admission of guilt

Form No. 70-119 (Revised 9/93)

AGC-S2M000320

FULLER®
A member of the FLSmidth-Fuller Engineering Group

JUN 30 1992

29 June 1992

Ash Grove Cement Company
3801 East Marginal Way, South
Seattle, Washington 98134

Attention: Mr. Nathan A. Fernow
Quality Control Manager

Subject: Seattle Plant
Transmittal No.: AG92-039
PSAPCA Notice of Violation

Dear Nate:

We have completed our review of the dust emissions as noted on the PSAPCA Notice of Violation No. 28577. Our proposed corrective action plan is based on operational control and a modification to the equipment venting arrangement. Together these two (2) actions will provide a continuous positive means of helping to contain the dust within the system during shutdowns. Please review the plan and if acceptable to Ash Grove and PSAPCA, we can begin to implement the equipment modification.

CORRECTIVE ACTION PLAN

1. Operational Control

The system has been designed to operate under negative pressure at all times. During normal operation, the preheater I.D. fan maintains a negative draft at the cooler hood which prevents dust from escaping the system. When an upset condition occurs in the process which requires that kiln and preheater I.D. fan be stopped, it is possible that some dust may be released through openings at the discharge hood. At this time, it is necessary to create as much negative pressure as is possible by using the baghouse fan. All the control room operators have been instructed to pay particular attention to this mode of operational control of dust emissions during a kiln shutdown.

FULLER COMPANY
2040 Avenue C • Bethlehem, Pennsylvania 18017-2188
Telephone: 215-264-6011 • FAX: 215-264-6170
Telex: 173189 FULLERCO CAQA • Cable: COLFULLER

2. Equipment Venting Arrangement

In addition to the above operational controls, a dust collector venting arrangement is also being proposed. The intent is to vent the cooler discharge hood to the nearest dust collector located at the G-cooler. A schematic of the venting arrangement is shown on the attached drawing no. 135-92-5-1801. The existing dust collector and fan has sufficient reserve capacity to vent the discharge hood at all times without interfering with the current operation. Such an arrangement would be in operation continuously, irrespective of whether the kiln is running or not.

We assume Ash Grove will convey this plan to PSAPCA and obtain acceptance prior to any work being initiated by us.

Please let us know if you need additional information to complete your review.

Very truly yours,

FULLER COMPANY

Girish Sud
Senior Project Manager

GS:gk

Attachments